

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

LIBERTARIAN NATIONAL
COMMITTEE, INC.,

Plaintiff,

v.

MIKE SALIBA, et. al.

Defendants

CIVIL ACTION NO.:

23-cv-11074

JURY TRIAL DEMANDED

DECLARATION OF ANDREW CHADDERDON

Under 28 U.S.C. §1746, I, Andrew Chadderdon, declare as follows, under penalty of perjury:

1. I am over the age of 18, of sound mind, and otherwise competent to provide this declaration under penalty of perjury.

2. I am the Chair for the Libertarian Party of Michigan and the President of the Libertarian Party of Michigan Executive Committee, Inc.

3. In these roles I have personally witnessed and seen the effects of the actions of the Defendants that will continue and worsen if not enjoined.

Specifically, the Defendants, individually or collectively have:

- a) Through their actions and this resulting controversy have turned away many active members and donors who previously had been engaged for years.
- b) Solicited political and legal defense donations using the Party's name and branding.
- c) Taken our private membership data in violation of signed NDAs for communications causing a lack of trust and an unwillingness for new persons to sign-up for communications and membership.
- d) Impersonated through "email spoofing" our domain and informational email address.
- e) Regularly sent "responses" to our official communications disparaging our legitimacy, instructing members to ignore our communications, and sending out completely contradictory information, all while claiming their communications are the official responses of the Party.
- f) Spread frivolous claims that our actions, rather than their own, are jeopardizing the Party's ballot access and ability to run candidates.
- g) Forced the calling of a special convention that none of the Defendants attended and also attempted to have the venue contract cancelled with claims that the signers were not authorized to do so.
- h) Advertised and held illegitimate meetings claiming they were official meetings of the Party.

- i) Purported to change the Party Bylaws at an illegitimate convention thereby confusing the membership as to the actual rules of the Party and their rights and the validity of their convention in relation to the special convention called by the recognized affiliate on the same date.
- j) Inflicted reputational damage by misleading communications to nationally prominent figures such as Presidential hopeful Jacob Hornberger.
- k) Forced the wasting of Party funds and resources in legal costs and fees and well as filing fees with Michigan in our attempts to correct the corporate records.
- l) Filed false paperwork with Michigan Department of Licensing and Regulatory Affairs, Michigan Bureau of Elections, and the FEC.
- m) Refused to properly turn over the bank account assets leading to the effective freezing of over \$38,000.00 in assets and harassed the bank to the point where it felt compelled to file an interpleader action.
- n) Refused to turn over the Party's passwords and logins to needed resources.
- o) Refused to turn over Party assets including the Post Office Box, phone number, PayPal account, and Amazon services account.
- p) Refused to turn over the Party's EIN which is preventing the Party from opening a new bank account and fundraising.

- q) Defamed various board and Party members with the press including a front page article in the Detroit News and interview on local radio show (Robert Ficano Show) causing both myself and the Party reputational damage and embarrassment.
- r) Filed a false take-down complaint with the Party's domain name provider.
- s) Impersonated the Party on social media.
- t) Instigated the blocking of members from being selected as delegates to the special convention.
- u) Attempted to hijack the digital assets of the Libertarian Party of Wayne County (a Party sub-affiliate) and using a deceptive domain for that sub-affiliate to redirect to their false website.

4. Exhibit 15 attached hereto is a true and accurate copy of an announcement distributed by Plaintiff in an effort to correct the confusion caused by Defendants' misinformation campaign and unauthorized use of Plaintiff's trademarks.

5. Exhibit 16 attached hereto is a true and accurate copy of the March 3, 2023, e-mail Call to Convention from the unrecognized Libertarian Party of Michigan including the email spoofing.

6. Exhibit 20 attached hereto is a true and accurate copy of a collection of social media posts of some of the Defendants along with a photograph of one of

their supporters disrupting a legitimate meeting indicating that they will not comply with the cease and desist letters from Plaintiff.

7. Exhibit 21 attached hereto is a true and accurate copy of an e-mail from the recognized Libertarian Party of Michigan to the Libertarian Party of Genesee County Chaired by Defendant Canny demanding a cease and desist or be disaffiliated from the recognized affiliate.

8. Exhibit 24 attached hereto is a true and accurate copy of an e-mail from the recognized Libertarian Party of Michigan to the Libertarian Party of West Michigan chaired by Defendant Buzuma demanding a rescission of its failure to recognize the legitimate affiliate or be disaffiliated.

9. Exhibit 28 attached hereto is a true and accurate copy of Meeting Minutes Libertarian Party of Michigan Libertarian Executive Committee Meeting by Zoom 25 January 2023, demonstrating that the majority of the Defendants accepted the Chairmanship of Andrew Chadderdon without objection and that Defendant Brundardt agreed to add Mr. Chadderdon as a signatory to the Libertarian Party of Michigan bank account.

10. Exhibit 29 attached hereto is a true and accurate copy of a January 30, 2023, e-mail from Daniel Ziemba, the Secretary of the recognized affiliate, to the Libertarian Party of Michigan local affiliate chairs, announcing a special

convention which was properly called and authorized via a petition of the membership.

11. Exhibit 30 attached hereto is a true and accurate copy of a January 31 e-mail from Defendant Brungardt announcing a call to convention for the illegitimate Libertarian Party of Michigan on the same date as the legitimate special convention with no authority to do so.

12. Exhibit 36 attached hereto is a true and accurate copy of a mass distribution e-mail from Defendant Saliba, representing his group to be the Libertarian Party of Michigan and using the “Libertarian Party” trademark.

13. Exhibit 34 attached hereto are true and accurate copies of some email inquiries received indicating actual confusion on the part of Libertarian Party of Michigan membership.

14. Exhibit 36 is a true and accurate copy of an email sent by Defendant Saliba to the membership of the Libertarian Party of Michigan instructing them to ignore the recognized affiliate and its upcoming convention.

15. Exhibit 38 attached hereto is a true and accurate copy of an email sent by Defendant Van Alstine planning a new membership card which will confuse members into thinking they are members of the legitimate Michigan Libertarian Party affiliate.

Executed on 6/1/23.

A handwritten signature in cursive script, appearing to read "Andrew Chadderdon", is written over a horizontal line.

Andrew Chadderdon, LPM/LPMEC Chair